

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO SALES TAX FINANCING CORPORATION, Debtor.	PROMESA Title III Case No. 17 BK 3284-LTS

**MOTION TO WITHDRAW OBJECTION TO DISCLOSURE STATEMENT AT
DOCKET NO. 4225. [Case No. 17-3284, ECF No. 328]**

To the Honorable United States District Court Judge Laura Taylor Swain.

COME NOW, Cooperativa de Ahorro y Crédito de Rincón, Cooperativa de Ahorro y Crédito Dr. Manuel Zeno Gandía, Cooperativa de Ahorro y Crédito del Valenciano and Cooperativa de Ahorro y Crédito de Juana Díaz (hereafter referred to as (“Credit Unions”), by and through the undersigned counsel, who respectfully states and prays as follows:

1. On October 19, 2018, the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as representative of the Puerto Rico Sales Tax

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

Financial Corporation (the "Debtor" or "COFINA") filed the *Disclosure Statement for the Title III Plan of Adjustment of the Debts of Puerto Rico Sales Tax Financing Corporation* (the "Disclosure Statement") at [Dkt. No. 4073]; [Case No. 17-3284, ECF No. 310].

2. On November 14, 2018, the appearing Credit Unions filed their *Objection to the Disclosure Statement by Four Credit Unions Who Are Creditors in this Case* at docket no. 4225. [Case No. 17-3284, ECF No. 328].
3. On November 16, 2018, the Oversight Board filed the *Disclosure Statement for the Amended Title III Plan of Adjustment of the Debts of Puerto Rico Sales Tax Financing Corporation* (the "Revised Disclosure Statement"), which had attached as Exhibit A thereto the *Amended Title III Plan of Adjustment of the Debts of Puerto Rico Sales Tax Financing Corporation* (the "Amended Plan of Adjustment"). [Case No. 17- 3284, ECF No. 353].
4. While the appearing creditors are still in the process of reviewing the *Revised Disclosure Statement* and the additional information included therein, in sake of moving forward with the consideration of the Plan of Reorganization, the appearing Credit Unions hereby withdraw their objection to the Disclosure Statement at docket no. 4225., as further supplemented yesterday. [Case No. 17-3284, ECF No. 328].
5. The appearing creditors reserve all rights to complete their review of the new information and documents submitted and raise any argument and objections to the confirmation of the plan or any plan filed thereafter, as may be appropriate.

WHEREFORE, the Credit Unions respectfully requests that the Court grants this motion and withdraw the objection to the Disclosure Statement at docket no. 4225. [Case No. 17-3284, ECF No. 328].

NOTICE

Notice of this Objection shall be provided to (a) counsel for the Oversight Board, (b) counsel for the Trustee, (c) Office of the United States Trustee for the District of Puerto Rico, (d) attorneys for the Puerto Rico Fiscal Agency and Financial Advisory Authority, (e) attorneys for the Official Committee of Unsecured Creditors, (f) those creditors holding the 20 largest unsecured claims against COFINA, (g) attorneys for the Official Committee of Retired Employees, (h) the attorneys for Ambac Assurance Corporation, (i) the attorneys for Assured Guaranty Municipal Corp., (j) the attorneys for National Public Finance Guarantee Corporation, (k) the attorneys for the COFINA Senior Bondholders' Coalition, (l) the attorneys for Oppenheimer and the First Puerto Rico Family of Funds, (m) the attorneys for Goldman Sachs Asset Management, L.P., (n) the attorneys for the Puerto Rico Funds, (o) the attorneys for Bonistas del Patio, Inc. (p) the attorneys to certain of the Insured Senior Holders, (q) the attorneys to GoldenTree Asset Management LP, (r) the attorneys to Tilden Park Capital Management LP, (s) the attorneys to Whitebox Advisors LLC, (t) the attorneys for Aurelius and Six PRC, and (u) all parties that have requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure. The Credit Unions submit that, in light of the nature of the relief requested, no other or further notice is necessary or required.

CERTIFICATE OF SERVICE

WE hereby certify that, on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 20th day of November of 2018.

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Dated: November 20, 2018

San Juan, Puerto Rico